

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In re Terrorist Attacks on September 11, 2001

As relates to: 03 MDL 1570 (GBD) (SN)

JESSICA DERUBBIO, et al.

Civil Docket Number: 18-cv-05306

PLAINTIFFS,

SECOND NOTICE OF AMENDMENT

v.

ISLAMIC REPUBLIC OF IRAN,

ECF CASE

DEFENDANT.

This document relates to:

Jessica DeRubbio, et al. v. Islamic Republic of Iran, No. 1:18-cv-05306 (GBD) (SN).

Plaintiffs file this Notice of Amendment with respect to the underlying Complaint in the above-referenced matter, ECF No. 6 (the “Underlying Complaint”), as permitted and approved by the Court’s Order of May 25, 2018, ECF No. 4010, read with the Order dated April 27, 2018, ECF No. 3982. Upon the filing of this Notice of Amendment, the Underlying Complaint is deemed amended to add the individuals listed below (the “New Plaintiffs”) as plaintiffs raising claims against the Islamic Republic of Iran, and adopting the factual allegations, jurisdictional allegations, and jury trial demand of the Underlying Complaint and *Burnett Iran* Complaint, Docket Number 15-cv-9903 (S.D.N.Y.) (GBD)(SN) (ECF Doc. No. 53), as well as all causes of action specified below. The amendment effected through this Notice of Amendment supplements by incorporation into, but does not displace, the Underlying Complaint. This Notice of Amendment relates solely to the Islamic Republic of Iran and does not apply to any other defendant.

CAUSES OF ACTION

The New Plaintiffs hereby adopt and incorporate herein by reference the causes of action set forth in the Underlying Complaint and the *Burnett* Iran Complaint, Docket Number 15-cv-9903 (S.D.N.Y.) (GBD)(SN) (ECF Doc. No. 53).

New Plaintiffs are making such claim on the following basis, and incorporate by reference that supplemental information provided in the Identification of New Plaintiffs below, identifying the New Plaintiffs asserted basis for participating in this suit:

- ☐ Estate Wrongful Death Claim by Estate Representative on Behalf of an Individual Killed as a result of the September 11, 2001 Terrorist Attacks
- ☒ Solatium Claim by Immediate Family Member of an Individual Killed as a result of the September 11, 2001 Terrorist Attacks
- ☐ Personal Injury Claim by Individual Injured as a result of the September 11, 2001 Terrorist Attacks

IDENTIFICATION OF NEW PLAINTIFFS

Each New Plaintiff is or was a survivor of a person who died due to the terrorist attacks of September 11, 2001. For each New Plaintiff, the following chart lists the New Plaintiff's name, the New Plaintiff's residency and nationality, the name of the New Plaintiff's deceased family member, the New Plaintiff's relationship to the decedent, and the paragraph(s) of the Underlying Complaint discussing the decedent and/or the decedent's estate.

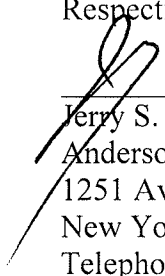
	New Plaintiff's Last Name, First Name	State of Residency at Filing (or death)	Citizenship/ Nationality on 9/11/2001	Decedent's Name (alphabetical by last name)	New Plaintiff's Relationship to Decedent	Paragraphs of Complaint Discussing Decedent 1:18-cv-05306
125	Fields, Sharaia	GA	United States	Fields, Samuel Sr.	Daughter	¶ 20
126	Fogel, David	FL	United States	Fogel, Stephen M.	Brother	¶ 21

	New Plaintiff's Last Name, First Name	State of Residency at Filing (or death)	Citizenship/ Nationality on 9/11/2001	Decedent's Name (alphabetical by last name)	New Plaintiff's Relationship to Decedent	Paragraphs of Complaint Discussing Decedent 1:18-cv-05306
127	Fogel, Brittany	NJ	United States	Fogel, Stephen M.	Daughter	¶ 21
128	Fogel, Joseph	NJ	United States	Fogel, Stephen M.	Son	¶ 21
129	Hamorsky, Karen	FL	United States	Fogel, Stephen M.	Sister	¶ 21
130	Foreman, David	NY	United States	Foreman, Donald A.	Brother	¶ 28
131	Foreman, Marcus	IN	United States	Foreman, Donald A.	Son	¶ 28
132	Cappo, Felicia	NJ	United States	Frank, Gary J.	Sister	¶ 33
133	Vigeant, Laurie	NJ	United States	Frank, Gary J.	Sister	¶ 33
134	Freeman, Juanita	NC	United States	Freeman, Tamitha	Mother	¶ 34
135	Freeman, Carla	NY	United States	Freeman, Tamitha	Sister	¶ 34
136	White, Xavier	NC	United States	Freeman, Tamitha	Son	¶ 34
137	Freiman, Bonnie	FL	United States	Frieman, Brett O.	Mother	¶ 35
138	Freiman, Herbert	NY	United States	Frieman, Brett O.	Father	¶ 35
139	Freiman, Michael	FL	United States	Frieman, Brett O.	Brother	¶ 35
140	Belford, Carolyn	NY	United States	Gallagher, Anthony E.	Sister	¶ 39
141	Gallagher, Joseph	China	United States	Gallagher, Anthony E.	Brother	¶ 39
142	Gallagher-Adams, Suzanne	NY	United States	Gallagher, Anthony E.	Sister	¶ 39
143	Varland, Carol	MO	United States	Geis, Julie M.	Sister	¶ 40
144	Geis, Michael	NE	United States	Geis, Julie M.	Brother	¶ 40

	New Plaintiff's Last Name, First Name	State of Residency at Filing (or death)	Citizenship/ Nationality on 9/11/2001	Decedent's Name (alphabetical by last name)	New Plaintiff's Relationship to Decedent	Paragraphs of Complaint Discussing Decedent 1:18-cv-05306
145	Baronian, Janet	NY	United States	Geraghty, Edward F.	Sister	¶ 41
146	Cannata,, Lynn E.	NY	United States	Geraghty, Edward F.	Sister	¶ 41
147	Geraghty, Stephen	NY	United States	Geraghty, Edward F.	Brother	¶ 41
148	Geraghty, Norma	NY	United States	Geraghty, Edward F.	Mother	¶ 41
149	Geraghty, Colleen	AZ	United States	Geraghty, Edward F.	Sister	¶ 41

Dated: June 26, 2018


Respectfully submitted,



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 COUNSEL FOR PLAINTIFFS

CERTIFICATE OF SERVICE

I hereby certify that on June 4, 2018, I caused the foregoing Notice of Amendment, to be served via the Court's ECF system to all counsel of record in Case Number 03-MDL-1570 (GBD) (SN).



Jerry S. Goldman